

Judge: Christopher M. Alston  
Chapter: 7  
Hearing Location: Seattle  
Hearing Date: 6-28-19  
Hearing Time: 9:30 a.m.  
Response Date: 6-21-19

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

In Re:

JASON L. WOEHLER,

Debtor

Case No: 18-12299-CMA

RESPONSE TO MOTION  
FOR TURNOVER

COMES NOW Jason Woehler, by and through counsel, and responds to the trustee's motion for turnover. The debtor requests the motion be denied. This response is based on the declarations of Jason Woehler and James Dickmeyer submitted herewith.

Mr. Woehler denies he has failed to cooperate with the trustee. He has been working diligently to secure the funding to pay the estate the nonexempt equity in the residence and, in the meantime, paying the mortgage, keeping the home insured and maintaining it. Mr. Woehler's originally intended lender, a longtime family friend, has recently encountered some financial bumps in the road as well and is helping Mr. Woehler find alternate funding. Mr. Woehler's objective is still to save his residence if at all possible.

Mr. Woehler was forced to reschedule the trustee's agent's inspection of the home in January 2019, and the delay was about one week. Mr. Woehler denies receiving the number of

1 messages the trustee's agent states he left. He believes the agent did try to reach him a couple  
2 times but the number was not recognized, the call was not answered and no voice mail was left.  
3 Mr. Woehler's counsel was not notified of any difficulty the agent had reaching Mr. Woehler,  
4 as is the agent's custom.  
5

6 Notwithstanding his desire and intention to save his home by paying the estate the  
7 nonexempt equity, Mr. Woehler will cooperate with Mr. Jones's efforts to get a key and list the  
8 property. Mr. Woehler's current housemate can provide a key if Mr. Woehler is out of town, as  
9 he is frequently for business.

10 DATED this 21<sup>st</sup> day of June, 2019

11 James E. Dickmeyer, PC

12  
13 By /s/ James E. Dickmeyer

14 James E. Dickmeyer WSBA #14318  
15 Attorney for Debtor  
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